

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RECEIVED

9-19-16  
SEP 19 2016

DC

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Harold VAUGHN

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No:

1:16 CV 8119

(To be supplied by the Clerk of this Court)

SHERIFF TOM DANT

SHERIFF J. STEINMAN #16829

SHERIFF MEDINA

DIANNE WALSH

SHERIFF JOHN DOES

~~OFFICER FILLMOORE~~

ADA lady SEBRINA

SHERIFF FILLMOORE

Social workers JOHN DOES

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: HAROLD VAUGHN
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: \_\_\_\_\_
- D. Place of present confinement: COOK COUNTY Jail
- E. Address: P.O. Box 089002

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: SHERIFF TOM DART  
Title: SHERIFF  
Place of Employment: COOK COUNTY
- B. Defendant: SHERIFF J. STEINMAN # 16829  
Title: SHERIFF  
Place of Employment: COOK COUNTY
- C. Defendant: DIANNE WALSH  
Title: SOCIAL WORKER  
Place of Employment: COOK COUNTY

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

D. defendant: SHERIFF MEDINA  
title: SHERIFF  
PLACE OF EMPLOYMENT: COOK COUNTY

E.) defendant: SHERIFF JOHN DOES  
title: JOHN DOES (SHERIFFS)  
PLACE OF EMPLOYMENT: COOK COUNTY Jail

F.) defendant: SEBRINA ADA  
title: JOHN DOES  
PLACE OF EMPLOYMENT: COOK COUNTY Jail

G.) defendant: SHERIFF FILLMORE  
title: SHERIFF  
PLACE OF EMPLOYMENT: COOK COUNTY



**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Harold VAUSHN  
V. TOM DART ET AL # 1:16 CV 8119
- B. Approximate date of filing lawsuit: AUG, 15, 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
HAROLD VAUSHN
- D. List all defendants: \_\_\_\_\_
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): U.S district court
- F. Name of judge to whom case was assigned: Judge THOMAS  
M. DUNKIN
- G. Basic claim made: Failure to protect
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: OPEN

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

100.7 Million Pain + Suffering  
COMPENSATORY DAMAGES  
ALSO PUNITIVE DAMAGES

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 9 day of 9, 2016

X Harold Vaughn  
(Signature of plaintiff or plaintiffs)

HAROLD VAUGHN  
(Print name)

20121025276  
(I.D. Number)

COOK COUNTY Jail  
P.O. Box 089002  
(Address) CHICAGO, IL, 60608



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## STATEMENT OF claim

ON 5-3-16: My ~~own~~ US constitutional rights WAS VIOLATED: under the 8th ALSO 14th AMENDMENT: due process clause / deliberate Indifference clause / cruel AND USUAL PUNISHMENT / Failure to protect clause:

ON 5-3-16 I WAS ASKED, to COME to talk to Inmate Miguel Angel colon # ~~20141213002~~ 20141213002: I started to approach Miguel colon: HE stated to ME: COME IN to cell I want to show you SOMETHING: I THEN enter the cell, UNKNOWING AN ATTACK WAS IMMINENT: AS I enter the cell Miguel colon SLAMMED the door BEHIND ME: THEN Inmate SHAWN K BLACK # 20150927028 SWUNG A SOCK: ~~with~~ Full with SOAP: HIT ME VERY HARD ON the right side of MY FACE that cause ME to BE Knocked out (UNCONCIOUS): WHEN I ~~was~~ ~~awoke~~ Awakened I Had blood running down MY FACE: EXTREME PAIN: THEN SHAWN K BLACK: Start STABBING ME IN the FACE with real INK PEN over and over! right eye right cheek, right ARM, AM BLEEDING really BAD FROM this ASSAULT: ~~offended~~



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~~SHAWN~~ SHAWN K BLACK <sup>is</sup> still STABBING ME Hitting ME: KICKING ME: I WAS ON THE FLOOR ALL THIS TIME: I got up on one leg cause I HAVE <sup>no</sup> STRENGTH in legs THE LEFT ONE: I WAS TRYING TO HOP TO THE DOOR THEN SHERIFF J. STEINMAN ORDERED MIGUEL COLON TO STEP AWAY FROM DOOR: WHEN THE DOOR WAS OPEN THE OFFICER ORDER SHAWN BLACK TO STOP HITTING ME: SO HE DID, THEN I ~~PRO~~ PROCEEDED TO FALL TOWARDS THE SINK AND SIT DOWN ON THE TOILET: AND THEN THE OFFICER STEINMAN ORDERED ME TO COME OUT THE CELL I PULLED MYSELF UP: BLEEDING ALSO IN EXTREME PAIN I GOT IN MY WHEELCHAIR THEN CAME OUT TO DAY ROOM: I WAS REALLY HURT EXTREMELY BAD: I WAS TAKEN STRAIGHT TO ~~ST. JOSEPH'S~~ CERMAL HOSPITAL TO STENOSES BY AMBULANCE: WHERE I STAYED IN TRAUMA UNIT FOR 24 HOURS: WHERE I SUFFERED ~~FOR~~ FROM HEAD CONCUSSION ALSO DAMAGE TO MY EYE, FACE, ARM (RIGHT): THEN WAS TRANSFERRED BACK TO CERMAL HOSPITAL: AND WAS THERE FOR A WEEK: I STILL SUFFERING FROM A CONCUSSION AND LOST VISION IN RIGHT EYE: ALSO DAMAGE TO FACE ALSO ARM: I FEEL THIS IS RETILIATION CAUSE OF MY OTHER LAWSUITS: THERE ARE SO MANY THINGS ~~THAT~~ THAT THEY HAVE DONE AND ARE DOING: THAT I CAN PROVE: THAT



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THIS IS ~~retribution~~ RETILIATION: A couple days prior: SHAWN BLACK THREATEN ME WITH A 12 inch Jail House SHARP KNIFE: I spoke OFFICER Fillmore: And He found the KNIFE, TAPED up under the sink in day room: OFFICER Fillmore proceeded: REMOVE THE KNIFE FROM THE DAY ROOM: Knewing SHAWN BLACK WAS AFTER ME AND NEVER REMOVE HIM FROM THE DECK or write HIM UP: And ALL THE OTHER DEFENDANTS in this CASE WAS NOTIFIED: That IT WAS A PROBLEM AND did NOTHING: And when I wrote A grievance: I WAS told that I could not dictate who WAS to BE HOUSED: I spoke to Sst: JOHN DOE: HE told ME this problem is every where: what AM I going to do! I HAVE A court order to HAVE NO contact: BETWEEN SHAWN K. BLACK # 20150927028 ALSO MIGUEL Angel colon # 20141213002: And they still ARE putting US together ALSO sending US to Hospital together: over and over again: All of this IS on video: over and over AM getting put in Bullpens with general population: Here At Cook county Jail Also ~~Hamilton~~ Hamilton court House: closing the Automatic doors while I WAS in the middle of IT in wheel chair By officer: JOHN DOES, And slamming on the Brakes on the way to



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court: throwing me out of wheel chair  
 busting my head: By Sheriff John Does  
 : Sending to Mercy Hospital: And on  
 Another matter: on the way to court  
 Sheriff John Does slammed on brakes  
 in van: throwing me in to the steel  
 bar ~~in~~ next to wheel chair ~~at~~ 19 ft ramp:  
 so hard it ~~was~~ knock pole loose from van:  
 Also knocked my shoulder out of place:  
 And the state attorney is messing with  
 me about my other lawsuits: Also have  
 grievances to prove all of this: even doe  
 I have a court order for law library  
 to be taken to law library once a week:  
 They deny me: (Supervisor Lalle liable)  
 And also refuse to give me copies of  
 grievances to send the court: unless:  
 Also some of the mornings: For breakfast  
 they gave me 2 pieces of bread and pack  
 of butter: And some mornings two pieces of  
 bread and a pack of jelly and force us to  
 drink this water even doe they know  
 that the ground is polluted and waste  
 goes into the water line: Also tell the  
 officers dont drink the water: